

**FAC No. SU-[text-deleted]**

Golden Escrow, Inc.  
Attn: Doreen Chan, Escrow Officer  
1525 South Garfield Avenue  
Alhambra, CA 91801

**PENALTY NOTICE**

Dear Ms. Chan:

A Prepenalty Notice ("Notice") dated May 8, 2007, copy enclosed, was issued by the Office of Foreign Assets Control ("OFAC") to Golden Escrow, Inc. ("Golden") for prohibited transactions relating to Sudan, involving Golden's attempt to send a USD 364,595.48 funds transfer to China Jilin International Economic & Technical Corp., Sudan Branch in connection with a sale of real properties in September of 2004, violating § 538.205 of the Sudanese Sanctions Regulations, 31 C.F.R. Part 538 (the "Regulations"). Inasmuch as no license or authorization was issued by OFAC prior to the transactions, Golden appears to have violated the prohibitions set forth in Executive Order 13067 of November 3, 1997 (62 F.R. 59989, November 5, 1997) (the "Executive Order") and implemented by the Regulations, promulgated pursuant to the International Emergency Economic Powers Act, 50 U.S.C. 1701 – 1706, and other authorities. See, § 538.205 of the Regulations.

The Notice proposed a penalty in the amount of \$11,000 and advised Golden of the right to make a written presentation to OFAC setting forth reasons why a penalty should not be imposed, or if imposed, why it should be less than that proposed. Such written response was required to be made within thirty (30) days of the mailing of the Notice.

On May 8, 2007, OFAC mailed the Notice to Golden's address. On May 18, 2007, a Golden representative telephoned OFAC and informed OFAC of its receipt of the Notice and stated that Golden did not intend to pay the fine. No written response to the PPN has been received from Golden.

After a careful review of the entire file, it is determined that Golden did violate the Regulations and that a monetary penalty is warranted. OFAC further determines that no mitigation is indicated. Accordingly, there is no reduction in the proposed civil penalty amount and the proposed civil penalty in the amount of \$11,000 is hereby imposed upon Golden pursuant to the Regulations.

A check payable to the "**U.S. Treasury**" in the amount of **\$11,000** should be sent within 30 days of the mailing of this Penalty Notice to U.S. Treasury Department, Financial Management Division, 1500 Pennsylvania Avenue, N.W., (Attn: Metropolitan Square-6<sup>th</sup> Floor), Washington, D.C. 20220. In the alternative, an electronic funds transfer to the Department can be arranged with OFAC Civil Penalties. Please note that interest, administrative charges and late fees will begin to accrue after 30 days of the mailing of the Penalty Notice. Under Public Law 97-365, 31 U.S.C. § 3717, interest at

an annual rate of 5% and an administrative charge of \$12.00 will be added monthly if the amount is not paid by the due date. Should the amount not be paid within ninety (90) days, an additional late charge of 6% will be added.

Please note that the Regulations provide that this matter shall be referred for administrative collection measures or to the United States Department of Justice for collection if the penalty is not paid within 30 days of the mailing of the Penalty Notice.

**Please further note that 31 U.S.C. § 7701 requires that a person assessed a penalty by a Federal agency furnish a taxpayer identification number/Social Security Number and also requires the agency to disclose that the agency intends to use such number for the purposes of collecting and reporting on any delinquent penalty amount in the event of a failure to pay the penalty imposed.**

Sincerely,

[signature]

Adam Szubin  
Director  
Office of Foreign Assets Control